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3                   **UNITED STATES DISTRICT COURT**  
4                   **NORTHERN DISTRICT OF CALIFORNIA**  
5                   **OAKLAND DIVISION**  
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7                   IN RE CALIFORNIA BAIL BOND  
8                   ANTITRUST LITIGATION  
9  
10                  THIS DOCUMENT RELATES TO:  
11                  ALL ACTIONS  
12

Master Docket No. 19-cv-00717-JST-DMR

CLASS ACTION

**DECLARATION OF ADAM GITLIN IN  
SUPPORT OF STIPULATION RE:  
EXTENSION TO FILE THIRD  
CONSOLIDATED AMENDED  
COMPLAINT**

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1 I, Adam Gitlin, declare as follows:

2       1. I am a partner at the law firm of Lieff Cabraser Heimann & Bernstein, LLP, which  
 3 has been appointed Interim Class Counsel. I have personal knowledge of the facts herein and, if  
 4 called upon to testify to those facts, I could and would do so competently.

5       2. The Court ordered the Parties to proceed with discovery on December 10, 2020,  
 6 with Dismissed Defendants<sup>1</sup> to submit pre-amendment discovery focused on deficiencies the  
 7 Court identified in Plaintiffs' Second Amended Complaint (ECF No. 151).

8       3. The Court referred the management of discovery in this case, "including the issues  
 9 set forth in the [P]arties' joint case management statement, ECF No. 173," to Magistrate Judge  
 10 Ryu on January 25, 2021 (ECF No. 175).

11      4. The deadline for Plaintiffs to file their Third Consolidated Amended Complaint  
 12 ("TCAC") is January 10, 2022 (ECF No. 237).

13      5. On August 12, 2021, Plaintiffs and Dismissed Defendants submitted to Judge Ryu  
 14 a dispute regarding the proper geographic scope of pre-amendment discovery based on certain  
 15 search terms and custodians (ECF No. 208).

16      6. On September 30, 2021, Judge Ryu set a deadline of November 29, 2021 for  
 17 Dismissed Defendants to produce all responsive documents regardless of geography, except  
 18 documents that pertain solely to individual bail bond transactions outside of California (ECF No.  
 19 230), and related privilege logs were accordingly due by December 13, 2021 (ECF No. 183).

20      7. Several Dismissed Defendants were granted extensions to produce documents  
 21 pursuant to Judge Ryu's order by mid-December.

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 23      <sup>1</sup> For the avoidance of doubt, the Dismissed Defendants are Allegheny Casualty Company,  
 24 International Fidelity Insurance Company, AIA Holdings, Inc., American Contractors Indemnity  
 25 Company, Bankers Insurance Company, Accredited Surety and Casualty Company, Inc.,  
 26 Lexington National Insurance Company, Seneca Insurance Company, Continental Heritage  
 27 Insurance Company, Seaview Insurance Company, Danielson National Insurance Company,  
 28 Financial Casualty & Surety, Inc., Indiana Lumbermens Mutual Insurance Company, Lexon  
 Insurance Company, The North River Insurance Company, Philadelphia Reinsurance  
 Corporation, Sun Surety Insurance Company, United States Fire Insurance Company, Universal  
 Fire & Casualty Company, Williamsburg National Insurance Company, California Bail Agents  
 Association, Golden State Bail Agents Association, American Bail Coalition, Inc., Two Jinn, Inc.,  
 All-Pro Bail Bonds Inc., and Jerry Watson.

8. Plaintiffs require time to review Dismissed Defendants' document productions and privilege logs once produced, and may challenge entries in the latter.

9. The Parties propose extending the deadline for Plaintiffs to file their TCAC to February 25, 2022, and request this Court so order.

10. The Court has set no further deadlines in this matter, and therefore none would be affected.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 29, 2021, in Richmond, California.

*/s/ Adam Gitlin*

Adam Gitlin

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